

Enclosure A
Information Request
Franklin Street Groundwater Site

INSTRUCTIONS

1. Answer Each Question Completely. You must provide a separate answer to each question and subpart set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.

2. Response Format and Copies. Provide the responses to this Information Request and copies of all requested documents either electronically or on paper (hard copy). Your submission, whether electronic or hard copy, must include an index that lists all the responsive documents provided, and that indicates where each document is referenced in the written response, and to which question or questions each document is responsive.

Any documents you determine to be Confidential Business Information (CBI) must be segregated out and submitted in a separate folder or on a separate compact disc (CD). These documents must be clearly marked as "Confidential Business Information".

If providing your response electronically, it must be submitted on a CD in Portable Document Format (PDF) and comply with the following requirements:

(a) CBI and personal privacy information (PII) should be provided on separate media (e.g., a separate CD) and marked as such to ensure information is appropriately handled.

(b) All documents originally smaller than 11 by 17 inches can be submitted electronically; any documents originally larger than 11 by 17 inches must be submitted in hard copy.

(c) Electronic PDF files must be text-searchable.

(d) The document index must clearly identify any single electronic document which has been separated into multiple electronic files (because of size limitation or otherwise) and each component file that comprises the full document.

3. Number Each Answer. Number each answer with the number of the question to which it corresponds.

4. Provide the Best Information Available. You must provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.

5. Identify Information Sources. For each question, identify all persons and documents you relied on for your answer.

6. Confidential Information. You must provide the information requested even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as “trade secret”, “proprietary” or “company confidential”. Your confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice to you.

You should also provide a redacted version of the same document that removes all CBI and PII from the document. This redacted version of the document should remove all information that you claim is CBI or PII. Since all the CBI and PII is removed, this redacted version is not subject to the procedures of 40 C.F.R. Part 2. EPA may make this redacted version available to the public without further notice to you.

7. Disclosure to the EPA Contractor. Information that you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information that you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within twenty (20) business days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as “Personal Privacy Information”. You should note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you.

9. Objections. While you may object to certain questions in this Information Request, you must provide responsive information notwithstanding those objections. To object without providing responsive information may subject you to the penalties set out in the cover letter.

10. Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are

asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document that are responsive to the Information Request must be disclosed in your response.

11. Declaration. You must complete the enclosed declaration, in hard copy with an original signature, certifying the accuracy of all statements in your response.

Enclosure B
Information Request
Franklin Street Groundwater Site

DEFINITIONS

Terms not defined here shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601, or Volume 40 of the Code of Federal Regulations, in which case such statutory or regulatory definitions shall apply.

The following definitions apply to the following words as they appear in this Information Request:

1. The term "you" or "Respondent" means the addressee of this Request, together with the addressee's agents, employees, and contractors.
2. The term "document" and "documents" means any method of recording, storing or transmitting information. "Document" includes, but is not limited to:
 - (a) writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, fax transmittals;
 - ii. meeting minutes, telephone records, notebooks;
 - iii. agreements and contracts;
 - iv. reports to shareholders, management, or government agencies;
 - v. transportation manifests;
 - vi. copies of any document;
 - (b) any film, photograph, or sound recording on any type of device;
 - (c) any blueprints or drawings; and
 - (d) attachments to, or enclosures with, any document.
3. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position or business.
4. The term "identify" means, with respect to a corporation, partnership, business trust or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
5. The term "identify" means, with respect to a document, to provide: (a) its customary

business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. Alternatively, Respondent may provide a complete copy of the document.

6. The term "material" or "materials" means any and all raw materials, commercial products, wastes, chemicals, substances or matter of any kind.

7. The "period being investigated" and "the relevant time period" means 1950-present.

8. The term "property" means any interest in real or personal property whatsoever, including fee interests, leases, licenses, rental and mineral rights.

9. The "Site" means any or all property or areas described in the Hazard Ranking documentation record as within a 66.54-acre groundwater plume located in the undifferentiated outwash valley in Spencer, Indiana.

10. The term "waste" or "wastes" includes, but is not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.

11. The term "business activities" means all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Site, including surveying, sampling, grading, documentation, photography, demolition, construction, and waste disposal, and sales.

Enclosure C
Information Request
Franklin Street Groundwater Site

QUESTIONS

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. List the EPA Identification Numbers of the Respondent.
5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom.
6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors or by prior owners and/or operators.
7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify:
 - (a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
 - (b) Who supplied you with such hazardous substances;
 - (c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
 - (d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
 - (e) Where such hazardous substances were used, purchased, generated, stored, treated,

transported, disposed or otherwise handled by you; and

(f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

[Questions for Transporters]

8. Have you or any other person working with you or on your behalf ever accepted waste materials for transportation to the Site (to transshipment site) from any person? If the answer to this question is anything but an unequivocal no, identify:

(a) The persons from whom you or such other persons accepted waste materials for transport to the Site;

(b) Every date on which waste materials were so accepted or transported;

(c) For each transaction, the nature of the waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the material was used or the process which generated the material;

(d) For each material, describe any warnings given to you with respect to its handling;

(e) The owner of the materials so accepted or transported;

(f) The quantity of the material involved (weight or volume) in each transaction and the total quantity for all transactions;

(g) All tests or analyses and analytical results concerning each material; and

(h) The price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of waste materials brought to the Site).

9. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

10. State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation or lease arrangement (e.g., deeds, leases).

11. Provide information about the Site, including but not limited to the following:

(a) Property boundaries, including a written legal description;

(b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

- (c) Surface structures (e.g., buildings, tanks);
- (d) Ground water wells, including drilling log;
- (e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;
- (f) Any and all additions, demolitions or changes of any kind on, under or about the Site, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the Site; and
- (g) All maps and drawings of the Site in your possession.

12. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas) on the Site (or your property). For each such solid waste unit identified, provide the following information:

- (a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
- (b) The type of unit (e.g., storage area, landfill, waste pile), and the dimensions of the unit;
- (c) The dates that the unit was in use;
- (d) The purpose and past usage (e.g., storage, spill containment);
- (e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
- (f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit; and
- (g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

13. Identify the prior owners of the Site. For each prior owner, further identify:

- (a) The dates of ownership;
- (b) All evidence showing that they controlled access to the Site; and

(c) All evidence that a hazardous substance, pollutant or, was released or threatened to be released at the Site during the period that they owned the Site.

14. Identify the prior operators, including lessors, of the Site. For each such operator, further identify:

(a) The dates of operation;

(b) The nature of prior operations at the Site;

(c) All evidence that they controlled access to the Site; and

(d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.

15. Provide copies of all local, state and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, National Pollutant Discharge Elimination System permits).

16. Did the facility ever have "interim status" under RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

17. Did the facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.

18. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

19. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

(a) What the nature and scope of these investigations will be;

(b) The contractors or other persons that will undertake these investigations;

(c) The purpose of the investigations;

(d) The dates that such investigations will take place and be completed; and

(e) Where on the Site such investigations will take place.

20. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the Site. In addition, identify:

- (a) When such releases occurred;
- (b) How the releases occurred;
- (c) The amount of each hazardous substances, pollutants or contaminants so released;
- (d) Where such releases occurred;
- (e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- (f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and
- (g) All persons with information relating to these releases.

21. Was there ever a spill, leak, release or discharge of hazardous materials into any subsurface disposal system or floor drain inside or under the (Name of PRP) building? If the answer to the preceding question is anything but an unqualified "no," identify:

- (a) Where the disposal system or floor drains were located;
- (b) When the disposal system or floor drains were installed;
- (c) Whether the disposal system or floor drains were connected to pipes;
- (d) Where such pipes were located and emptied;
- (e) When such pipes were installed;
- (f) How and when such pipes were replaced, or repaired; and
- (g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.

22. Did any leaks, spills or releases of hazardous materials occur on the Site when such materials were being:

- (a) Delivered by a vendor;

- (b) Stored (e.g., in any tanks, drums or barrels);
- (c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units);
and
- (d) Treated.

23. Has soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

- (a) Amount of soil excavated;
- (b) Location of excavation;
- (c) Manner and place of disposal and/or storage of excavated soil;
- (d) Dates of soil excavation;
- (e) Identity of persons who excavated or removed the soil;
- (f) Reason for soil excavation;
- (g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials; and
- (h) All analyses or tests and results of analyses of the soil that was removed from the Site.

24. Provide a list of the customers you supplied hazardous substances to between (date) and (date).

Enclosure D
Information Request
Franklin Street Groundwater Site

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of the Respondent and that the foregoing is complete, true, and correct.

Executed on 8-13, 2019

Rodney Evans
Signature

Rodney Evans
Type or Print Name

Vice President
Title

Enclosure C Franklin Street Groundwater Site

- 1) Mr. Homer Riddle, my grandfather bought and moved his business here in 1955. He passed away in 1967. His wife then took over until she passed away in 1972. My father then took over until he passed away in June 2019. I have no one else to ask about the operation's but me. I worked there a few years in the 1980's.
- 2) I don't know of any documents to be consulted.
- 3) I know of no such person
- 4) N/A
- 5) I don't know of any acts or omissions
- 6) I know of no such person
- 7) No
- 8) No
- 9) Retail of Farm equipment (tractors & hay equip.)
- 10) Attached Doc's

- 11) A) Attached Docs
B)
C) Two pole buildings (5 N Short St & East side N Short St)
D) N/A
E) N/A
F) 40 years ago there was a house on the east side of N. Short St.
g) N/A

12) N/A

13) Homer Riddle
Emma Riddle
Vernon Riddle
Rosemary Evans
Lynn Evans
Rodney Evans

} PASSED AWAY

14) Riddle Tractor Sales Inc.
A) 1955 - Sept. 2019
B) Farm Equipment Sales

15) N/A

16) NO

17) NO

18) N/A

19) NO

20) N/A

21) NO

22) N/A

23) NO

24) N/A

DULY ENTERED

FEB 24 2017

Auditor Owen County

Patty Steward



208024

PEGGY ROBERTSON
OWEN COUNTY RECORDER
02/24/2017 10:50:05AM
REC FEE:18.00
PAGES: 2

Mail Tax Statement to:
Riddle Tractor Sales Inc.
5 N. Short Street
Spencer, Indiana 47460

QUIT-CLAIM DEED

This Indenture Witnesseth that Rosemary Evans of Owen County, in the State of Indiana Releases and Quit claims to Riddle Tractor Sales, Inc. of Owen County, in the State of Indiana, for the sum of One Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in OWEN County, in the State of INDIANA:

Lot 22, Lot 23 and Lot 24 in Gibson's Addition to the Town of Spencer, Indiana.

Commonly known as 5 N. Short Street, Spencer, Indiana 47460.
Mapping #60-10-20-400-400.297-028.

This conveyance is to release any and all interest in real estate pursuant to a Decree of dissolution of marriage and settlement agreement filed in open court January 19, 2017 in Cause No. 60C02-1602-DR-00018 re The Marriage of Lynn Allen Evans and Rosemary Evans, husband and wife in the office of Clerk of Owen County.

Subject to any and all utility easements, highway rights of way, encumbrances and other observable or recorded restrictions, conditions and limitations.

Grantor has executed this deed this 24th day of February, 2017.

Rosemary Evans

Rosemary Evans

STATE OF INDIANA, COUNTY OF OWEN, SS: Before me, a Notary Public in and

DULY ENTERED

FEB 24 2017

Auditor Owen County

Patty Steward



208026

PEGGY ROBERTSON

OWEN COUNTY RECORDER

02/24/2017 10:50:07AM

REC FEE:18.00

PAGES: 2

Mail Tax Statement to:

Riddle Tractor Sales Inc.
5 N. Short Street
Spencer, Indiana 47460

QUIT-CLAIM DEED

This Indenture Witnesseth that Lynn Allen Evans a/k/a Lynn A. Evans of Owen County, in the State of Indiana Releases and Quit claims to Riddle Tractor Sales, Inc. of Owen County, in the State of Indiana, for the sum of One Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in Owen County, in the State of INDIANA:

One-Half Interest in Lots Numbered Three (3) and Four (4) in Gibson's Addition to the Town of Spencer, except Sixty (60) feet in width off of the South ends of Lots Numbered Three (3) and Four (4) in Gibson's Addition to the Town of Spencer, Owen County, Indiana.

Commonly known on N. Short Street, Spencer, Indiana 47460.
Mapping #60-10-20-400-400.300-028.

This conveyance is to release any and all interest in real estate pursuant to a Decree of dissolution of marriage and settlement agreement filed in open court January 19, 2017 in Cause No. 60C02-1602-DR-00018 re The Marriage of Lynn Allen Evans and Rosemary Evans, husband and wife in the office of Clerk of Owen County.

Subject to any and all utility easements, highway rights of way, encumbrances and other observable or recorded restrictions, conditions and limitations.

Grantor has executed this deed this 26 day of February, 2017.

Lynn Allen Evans
Lynn Allen Evans

FILED ENTERED

FEB 24 2017

Auditor Owen County

Patty Steward



208027

PEGGY ROBERTSON

OWEN COUNTY RECORDER

02/24/2017 10:50:08AM

REC FEE:20.00

PAGES: 3

Mail Tax Statement to:

Lynn Allen Evans
4128 Gilmore Street
Spencer, Indiana 47460

QUIT-CLAIM DEED

This Indenture Witnesseth that Rosemary Evans of Owen County, in the State of Indiana Releases and Quit claims to Lynn Allen Evans a/k/a Lynn A. Evans of Owen County, in the State of Indiana, for the sum of One Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in OWEN County, in the State of INDIANA:

Part of the Northwest Quarter of the Southeast Quarter of Section 12, Township 9 North, Range 3 West, commencing at the Northeast corner of said Quarter-Quarter, thence West 694 feet along the North line of said Quarter-Quarter to the place of beginning, hence along fences by the three (3) following courses, thence South 5 degrees West 197 feet; thence West 166 feet; thence North 197 feet to the North line of said Quarter-Quarter; thence East 178 feet along said line to the place of beginning and containing 0.78 acres, more or less.

AND ALSO: A part of the Northwest Quarter of the Southeast Quarter of Section 12, Township 9 North, Range 3 West, in Owen County, Indiana, described as follows: Beginning at a point 694.00 feet West of the Northeast corner of the said Quarter-Quarter and in the centerline of a county road; thence South 03 degrees 02 minutes 30 seconds West for 611.41 feet; thence South 86 degrees 59 minutes East for 166.02 feet; thence North 48 degrees 57 minutes East for 131.72 feet; thence North 10 degrees 54 minutes 30 seconds East for 372.30 feet; thence North 02 degrees 14 minutes 30 seconds West for 167.28 feet and to the centerline of the county road; thence along the road centerline East for 296.94 feet and to the point of beginning. Containing 3.98 acres, more or less.

Subject to a 25.00 foot road easement along the county road.

The above description is taken from a survey dated August 21, 1973 by

DULY ENTERED

FEB 24 2017

Auditor Owen County
Patty Steward

THIS IS A CERTIFIED
COPY OF ORIGINAL



208025

PEGGY ROBERTSON
OWEN COUNTY RECORDER
02/24/2017 10:50:06AM
REC FEE:28.00
PAGES: 7

Mail Tax Statement to:

Rosemary Evans
704 Bayberry Ct E.
Bloomington IN
47401

QUIT-CLAIM DEED

This Indenture Witnesseth that Lynn Allen Evans a/k/a Lynn A. Evans of Owen County, in the State of Indiana Releases and Quit claims to Rosemary Evans of Owen County, in the State of Indiana, for the sum of One Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in OWEN County, in the State of INDIANA:

A part of the Southwest Quarter of Section 20, Township 10 North, Range 3 West, commencing at the Northwest corner of a lot of land heretofore conveyed to James W. Archer upon which was situated a planning mill, situate West of Spencer, at a stone at said corner, thence West 21 rods, thence South 24 rods to the grade of the Indianapolis and Vincennes Railroad Company, thence North of East along the said grade on the North side 24 rods to the Southwest corner of said lot heretofore conveyed to said Archer, thence North 20 rods and 14 links to the place of beginning, containing 2 27/100 acres, more or less. IN the Southwest Quarter of Section 20, Township 10 North, Range 3 West, except a strip of land lying East of a line 50 feet West and parallel to the West brick wall of the electric light company's building located at or near the East line of said tract.

ALSO, a part of the Southwest Quarter of Section 20, Township 10 North, Range 3 West, described as follows: Beginning at a point on the North line of Franklin Street in Spencer, Owen County, Indiana, said point being 821 feet West of the intersection of the West line of Terre Haute Avenue and the North line of Franklin Street, running thence West along the North line of Franklin Street, 286 - 1/3 feet to a Concrete Highway Marker; thence North 16 1/4 degrees West 46 1/3 feet, thence North 108 feet, to a highway marker, on the South line of the right of way of State Road No. 67, thence in a Northeasterly direction along the South line of the right



RIDDLE TRACTOR SALES,INC
5 North Short Street
Spencer, IN 47460

DION NOVAK, Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590